

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

PHYLLIS COLEMAN, individually and as
Administratrix of the Estate of SANTIA N.
WILLIAMS,

Plaintiffs,

v.

Case No. 12-cv-3509 (DRH)

COUNTY OF SUFFOLK, SUFFOLK COUNTY
POLICE DEPARTMENT, SUFFOLK COUNTY
SHERIFFS DEPARTMENT, Police Officers,
Deputy Sheriffs, and/or Detectives JOHN and
JANE DOES 1-10, Police Officer
CHRISTOPHER VERWYS, Police Officer
JASON MORGE, Police Officer JOHN
BRUNKARD, Police Officer MIGUEL VIAS,
Police Officer CORINNE TORRES, police
officer JOHN MCAULEY, Police Officer JOHN
MECURIO, Police Officer NICHOLAS
ASPROMGOS, Police Officer JAMES
O'CALLAGHAN, Police Officer SAMMY
SALEH, Police Officer GREGORY
POULETSOS, Police Officer LUIS RUIZ, Police
Officer VALENTIN ROSADO, Police Officer
FRANK ORTIZ, Police Sergeant
CHRISTOPHER LOVE.

Defendants.

**NOTICE OF MOTION BY PRESS INTERVENORS
TO INTERVENE AND UNSEAL THE RECORD**

PLEASE TAKE NOTICE that upon the accompanying memorandum of law, and upon all prior records and proceedings herein, Movants- Intervenor Newsday LLC and News 12 Company (d/b/a/ News 12 Long Island) (together, the "Press Intervenor"), by and through their undersigned counsel, respectfully move to intervene for the limited purposes of (1) challenging the Court's November 12, 2014 order, sealing Plaintiff's opposition to Defendant's motion for a

pre-motion conference (Docket No. 49); (2) opposing Defendant's application to seal or redact Plaintiff's opposition to defendants' motion for summary judgment (Docket No. 57); (3) unsealing any additional sealed judicial records or docket entries in this litigation; and (4) obtaining such other and further relief as may be just, proper, and equitable.

Dated: April 2, 2015

Respectfully submitted,

LEVINE SULLIVAN KOCH & SCHULZ, LLP

By: /s/ David A. Schulz
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Attorneys for Newsday LLC and News 12 Company

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of April, 2015, a true and correct copy of the foregoing **NOTICE OF MOTION BY PRESS INTERVENORS TO INTERVENE AND UNSEAL THE RECORD** was filed with the Court through the ECF system, which generates an electronic notice of service by email delivery to the following counsel of record:

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/s/ David A. Schulz